

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re: : Chapter 7
:
DEAN MAYNARD BOLAND, : Case No. 16-10250
:
Debtor. : Judge Jessica Price Smith

**JOINT MOTION SEEKING ENTRY OF AN AGREED ORDER EXTENDING,
THROUGH MAY 13, 2016, THE TIME FOR JOHN W. FORREST TO FILE A
COMPLAINT FOR NONDISCHARGEABILITY OF DEBT PURSUANT TO SECTION
523 OF THE BANKRUPTCY CODE**

John W. Forrest (“Mr. Forrest”), a party in interest in these proceedings, and Dean Maynard Boland (“Debtor”), by and through the undersigned counsel, hereby move this Court for entry of an agreed order, extending, through May 13, 2016, time for Mr. Forrest to file a *Complaint for Nondischargeability of Debt* (a “Complaint”), pursuant to § 523(a) of the Bankruptcy Code. In support of this Motion, the parties respectfully represent as follows:

BACKGROUND

1. On January 22, 2016 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 7 of the Bankruptcy Code. Mr. Richard A. Baumgart, Esquire serves as the Chapter 7 Trustee (the “Trustee”) in the Debtor’s case.
2. The current deadline for the filing of a complaint to have a debt excepted from discharge pursuant to § 523(a) of the Bankruptcy Code is April 29, 2016 (the “Deadline”).
3. The parties have been engaged in substantive ongoing negotiations for the resolution of outstanding issues. However, completion of the process requires additional time.
4. The parties request that that the Deadline for Mr. Forrest to file a Complaint, be extended, through and including May 13, 2016 (the “Extension”). The parties submit that the

requested Extension will not prejudice the interest of the Debtor, his estate or other parties in interest, and promotes the goals of judicial economy and efficiency.

5. The Trustee has been contacted, and has no objection to the relief requested herein.

WHEREFORE, the parties respectfully request that this Court enter its Order (i) extending, through May 13, 2016, the time for Mr. Forrest to file his Complaint, and (ii) granting such other relief as is just.

SEEN AND AGREED:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Motion for Entry of an Agreed Order, Extending, Through May 13, 2016, the Time for Mr. Forrest to File a Complaint for Nondischargeability of Debt* was served this 28th day of April, 2016:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Stephen D. Hobt, on behalf of the Debtor., at shobt@aol.com
- Richard A. Baumgart, Chapter 7 Trustee, at baumgart_trustee@dsb-law.com
- Sheldon Stein, on behalf of Victoria Bloom and Peter Lora, at ssteindocs@gmail.com
- United States Trustee (Registered address)@usdoj.gov

/s/ Dov Y. Frankel

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